

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

THE SAMUEL LAW FIRM

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Attorneys for Plaintiff

PABLO RAMON RODRIGUEZ,

Plaintiff,

- vs. -

New Generation Hardware Store
Corp. and Kevin Reyes,

Defendants.

DOCKET NO.1:22-cv-04422-LJL

**NOTICE OF MOTION
FOR DEFAULT**

NOTICE OF PLAINTIFF'S MOTION FOR DEFAULT JUDGMENT

PLEASE TAKE NOTICE, that upon the following declaration of Michael Samuel, Esq., the accompanying declaration of plaintiff Pablo Ramon Rodriguez and all pleadings and supporting materials filed herewith, Plaintiff hereby moves this Court for a default judgment in the amount of a sum certain of \$633,045.26, plus attorneys' fees and costs in the amount of \$4,220.00, or in the alternative for a proof hearing to establish plaintiff's damages.

Dated: August 25, 2022

/s/ Michael Samuel
Michael Samuel, Esq.